

# Exhibit A

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6 **IN THE UNITED STATES DISTRICT COURT**  
7 **FOR THE DISTRICT OF ARIZONA**

8 IN RE BARD IVC FILTERS  
9 PRODUCTS LIABILITY LITIGATION

No. 2:15-MD-02641 -DGC

10 **AMENDED SECOND AMENDED**  
11 **MASTER SHORT FORM COMPLAINT**  
12 **FOR DAMAGES FOR INDIVIDUAL**  
13 **CLAIMS AND DEMAND FOR JURY**  
14 **TRIAL**

15 Plaintiff(s) named below, for their Complaint against Defendants named below,  
16 incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc.364).

17 Plaintiff(s) further show the Court as follows:

18 1. Plaintiff/Deceased Party:

19 MICHAEL WILLIAMSON

20 2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of  
21 consortium claim:

22 SHARICA WILLIAMSON WRIGHT

Other Plaintiff and capacity (i.e., administrator, executor, guardian,  
conservator):

1 SHARICA ~~WILLIAMSON~~ **WRIGHT**, as Personal Representative of the Estate  
2 of MICHAEL WILLIAMSON

3 4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at  
4 the time of implant:

5 Maryland

6 5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at  
7 the time of injury:

8 North Carolina

9 6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

10 North Carolina

11 7. District Court and Division in which venue would be proper absent direct filing:

12 District of Columbia District Court

13 8. Defendants (check Defendants against whom Complaint is made):

14 ☒ C.R. Bard Inc.

15 ☒ Bard Peripheral Vascular, Inc.

16 9. Basis of Jurisdiction:

17 ☒ Diversity of Citizenship

18 ☐ Other: \_\_\_\_\_

19 a. Other allegations of jurisdiction and venue not expressed in Master  
20 Complaint:

10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a claim (Check applicable Inferior Vena Cava Filter(s)):

☒ Recovery<sup>®</sup> Vena Cava Filter

☐ G2<sup>®</sup> Vena Cava Filter

☐ G2<sup>®</sup> Express Vena Cava Filter

☐ G2<sup>®</sup> X Vena Cava Filter

☐ Eclipse<sup>®</sup> Vena Cava Filter

☐ Meridian<sup>®</sup> Vena Cava Filter

☐ Denali<sup>®</sup> Vena Cava Filter

☐ Other: \_\_\_\_\_

11. Date of Implantation as to each product:

On or about April 20, 2004

12. Counts in the Master Complaint brought by Plaintiff(s):

☒ Count I: Strict Products Liability – Manufacturing Defect

☒ Count II: Strict Products Liability – Information Defect (Failure to Warn)

☒ Count III: Strict Products Liability – Design Defect

- ☒ Count IV: Negligence – Design
- ☒ Count V: Negligence – Manufacture
- ☒ Count VI: Negligence – Failure to Recall/Retrofit
- ☒ Count VII: Negligence – Failure to Warn
- ☒ Count VIII: Negligent Misrepresentation
- ☒ Count IX: Negligence *Per Se*
- ☒ Count X: Breach of Express Warranty
- ☒ Count XI: Breach of Implied Warranty
- ☒ Count XII: Fraudulent Misrepresentation
- ☒ Count XIII: Fraudulent Concealment
- ☒ Count XIV: Violations of District of Columbia Law Prohibiting  
Consumer Fraud and Unfair and Deceptive Trade Practices
- ☐ Count XV: Loss of Consortium
- ☒ Count XVI: Wrongful Death
- ☒ Count XVII: Survival
- ☒ Punitive Damages
- ☐ Other(s): \_\_\_\_\_ (please state the facts supporting  
this Count in the space immediately below)

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13. Jury Trial demanded for all issues so triable?

☒ Yes

☐ No

RESPECTFULLY SUBMITTED this 29<sup>19</sup><sup>th</sup> day of ~~November~~ January, 2016 2017.

**LOPEZ McHUGH LLP**

By: /s/Matthew R. Lopez

Ramon Rossi Lopez (CA Bar No. 86361)

(admitted *pro hac vice*)

Matthew Ramon Lopez (CA Bar No. 263134)

(admitted *pro hac vice*)

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*Attorneys for Plaintiffs*

I hereby certify that on this 29<sup>19</sup><sup>th</sup> day of ~~November~~ January, 2016 2017, I  
electronically transmitted the attached document to the Clerk's Office using the CM/ECF  
System for filing and transmittal of a Notice of Electronic Filing.

/s/Matthew R. Lopez